

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Ingrid Cuevas, *on behalf of herself and others*
similarly situated in the proposed FLSA
Collective Action,

Case No.: 22-cv-06845

Plaintiff,

- against -

Manhattan Avenue Community Cafe Inc., and
Wascar Then,

Defendants.
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**OFFER OF JUDGMENT
PURSUANT TO
FED.R.CIV.P. 68**

To: Levin-Epstein & Associates, P.C.
Attn: Jason Mizrahi, Esq.
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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Manhattan Avenue Community Cafe Inc., and Wascar Then (collectively, the “Defendants”), hereby make this offer of judgment in favor of Plaintiff Ingrid Cuevas (the “Plaintiff”), and against Defendants in the above-captioned action in the total sum of Six Thousand Dollars and Zero Cents (\$6,000.00), payable as follows:

1. A payment in the amount of Six Thousand Dollars and Zero Cents (\$6,000.00) payable on or before September 1, 2022.

The total sum of Thousand Dollars and Zero Cents (\$6,000.00) is inclusive of reasonable attorney’s fees, costs, and expenses to date of this offer, in full and final settlement of all of Plaintiff’s claims against Defendants arising out, alleged in, or related to, the facts and transactions alleged in the above-captioned action.

This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Defendants or any owner, employee, or agent, either past or present, of the Defendants, or in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any of the Defendants, or any owner, employee, representative, or agent of any of the Defendants.

Acceptance of this offer of judgment will act to release and discharge Defendants, their respective successors or assigns, as well as all past and present owners, employees, representatives, and agents of the Defendants, in their respective capacity as such, from any and all claims that were or could have been alleged by Plaintiff in the above-referenced action. Acceptance of this offer of judgment also will operate to waive Plaintiff's rights to any claim for interest on the amount of the judgment.

In order for Plaintiff to accept this offer, Plaintiff must serve written notice of acceptance upon Defendants within fourteen (14) days after service of this Offer of Judgment. An offer not accepted within the specified period for acceptance will be deemed withdrawn.

Date: September 1, 2022
New York, NY

**MANHATTAN AVENUE COMMUNITY
CAFE INC.**

By: _____

Wascar Then
Authorized Signatory

WASCAR THEN

Wascar Then